

PRIDDY,
CUTLER,
MILLER & PLLC
MEADE

ALTON D. PRIDDY +
IRWIN H. CUTLER, JR.
MARK L. MILLER
SCOTT M. MILLER ++
DON C. MEADE

PETER J. NAAKE
MARY W. SHARP
EVERETT C. HOFFMAN +++
THOMAS J. SCHULZ
MARSHALL B. HARDY, JR., OF COUNSEL

+ ADMITTED IN INDIANA
++ ADMITTED IN COLORADO & PENNSYLVANIA
+++ ADMITTED IN CALIFORNIA

March 21, 2008

Beth O'Donnell, Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

RECEIVED
MAR 24 2008
PUBLIC SERVICE
COMMISSION

Re: Case No. 2007-00455

Dear Ms. O'Donnell:

Enclosed for filing find an original and ten copies of IBEW's Motion to Intervene in the above case.

Respectfully,



Don Meade

DM/sks
Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATIONS OF BIG RIVERS ELECTRIC)
CORPORATION, E.ON U.S., LLC, WESTERN)
KENTUCKY ENERGY CORP., AND LG&E) CASE NO. 2007-00455
ENERGY MARKETING, INC. FOR APPROVAL)
OF TRANSACTIONS; AND APPLICATION OF)
BIG RIVERS ELECTRIC CORPORATION FOR)
APPROVAL OF WHOLESALE TARIFF)
ADDITIONS; AND APPROVAL TO ISSUE)
EVIDENCES OF INDEBTEDNESS)

RECEIVED
MAR 24 2008
PUBLIC SERVICE
COMMISSION

IBEW MOTION TO INTERVENE

Comes the International Brotherhood of Electrical Workers, Local Union 1701, by counsel, and moves the Commission for an order granting full intervenor status. As grounds for the motion, IBEW has labor contracts with both Western Kentucky Energy, where it represents approximately 325 production and maintenance employees and with Big Rivers, where it represents a unit of approximately 24 transmission maintenance employees. The proposed transaction may potentially have an impact on the continuation of labor agreements, the terms and conditions of employment of both bargaining units.

IBEW seeks full intervenor status so that it may review the positions of Big Rivers and Western Kentucky Energy relative to its labor agreements, future staffing plans, plans for any reductions in force or any other information that may impact on the present conditions or future opportunities of its union employees. IBEW wishes to receive all filings, data requests, motions and other information as a full intervenor.

IBEW does not, at this time, intend to participate in the discovery phases of the case except to receive and evaluate the information. IBEW recognizes that its motion comes at a time when the procedural schedule is more than one-half completed. The Union does not anticipate that its participation will lead to any delays or complications, as it does not intend to move for leave to propound any data requests, nor to submit any witness testimony. It does intend to participate at the hearing in the cross-examination of witnesses. Despite its late filing, the employees of both Western Kentucky Energy and Big Rivers are significant stake holders in the transaction. Their participation, through the Union, should be viewed by the Commission as an important and necessary component to a full and fair hearing on all issues raised by the proposed transaction.

Counsel for Big River has consented to allow the undersigned to represent that Big River has no objection to the intervention.

For all these reasons, IBEW seeks full intervenor status according to 807 KAR 5:001(8)(b).

Respectfully submitted,

PRIDDY, CUTLER, MILLER & MEADE PLLC

A handwritten signature in black ink, appearing to read "Don Meade", written over a horizontal line.

Don Meade
800 Republic Bldg.
429 W. Muhammad Ali Blvd.
Louisville, KY 40202
(502) 587-8600
Counsel for IBEW, Local 1701

CERTIFICATE OF SERVICE AND FILING

I certify that an original and ten copies of this Motion to Intervene were served and filed with Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Blvd., Frankfort, KY 40601 by mailing same to her this 21st day of March, 2008. I further certify that true and accurate copies of the foregoing were mailed the same day via First Class U.S. Mail, postage pre-paid, to:

Dennis G. Howard, II
Lawrence W. Cook
Paul D. Adams
Assistant Attorneys General
1024 Capital Center Dr., Ste. 200
Frankfort, KY 40601-8204

James M. Miller
Sullivan, Mountjoy, Stainback & Miller
P. O. Box 727
Owensboro, KY 42302-0727

David A. Spainhoward, V.P.
and C. William Blackburn
Big Rivers Electric Corp.
P. O. Box 24
Henderson, KY 42420

Kendrick R. Riggs
Stoll Keenon Ogden
2000 PNC Plaza
500 W. Jefferson Street
Louisville, KY 40202

Allyson K. Sturgeon
E.ON U.S. Services, Inc.
220 W. Main Street
Louisville, KY 40202

Michael Kurtz
Boehm, Kurtz & Lowry
36 E. 7th Street, Ste. 1510
Cincinnati, OH 45202

David Denton
Denton & Keuler
P. O. Box 929
Paducah, KY 42002

John Hughes
124 W. Todd Street
Frankfort, KY 40601

David Brown
Stites & Harbison
1800 Providian Center
400 W. Market Street
Louisville, KY 40202

Frank N. King, Jr.
Dorsey, King, Gray,
Norment & Hopgood
318 Second Street
Henderson, KY 42420



Don Meade